

**REMARKS**

Claims 1-4, 6-24, 26-30 and 32-34 are currently pending in the subject application and are presently under consideration. Claims 1, 7, 10, 14, 15, 18, 23, 24, 32 and 33 have been amended as shown on pp. 2-8 of the Reply. Claims 2-4, 9, 13, 16 and 17 have been canceled.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

**I. Rejection of Claims 1-4, 6-7, 9-12, 20, 22-24, 26, 28-29 and 32-33 Under 35 U.S.C.**

**§103(a)**

In the Final Office Action dated August 9, 2007, claims 1-4, 6-7, 9-12, 20, 22-24, 26, 28-29 and 32-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sadahiro (U.S. 6,237,136) in view of CiteSeer (“CiteSeer: An Automatic Citation Indexing System” by Giles *et al.*). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Sadahiro and CiteSeer, individually or in combination, do not teach or suggest each and every element as set forth in the subject claims.

To reject claims in an application under §103, an examiner must show an un rebutted *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant’s disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The claimed subject matter relates to automated discovery of information. A software developer, for example, can discover and interpret technology-specific and programming-language-specific functionality utilizing natural and professional languages that may be independent of that employed by the author of the associated technical documentation describing such functionality. In particular, independent claim 1 recites a system that facilitates finding documentation, comprising: *a query component that receives a request for technical articles, the request comprising terminology of a first vocabulary corresponding to a first programming language, ...; and wherein*

*the user input is processed by a parser into functional objects relating to information components that are processed to facilitate desired information retrieval, ...; a mapping component that correlates terminology of the first vocabulary to semantically equivalent terminology of a second vocabulary related to a second programming language; and a discovery component that retrieves technical articles based upon the terminology of the second vocabulary that is semantically equivalent to the terminology of the first vocabulary employed in the request, **wherein the discovery component comprises an instrumentation component to determine an importance value for a retrieved technical document, the instrumentation component monitors at least one of visible technical documentation, search engine activity, and network traffic activity, and further monitors at least one of a counter, a type of word or phrase employed in a search, an implied or inferred measurement of data activity and an explicit request from users regarding a data source's technical value, ranking or merit.*** Independent claims 23, 24, 32 and 33 recite similar limitations. The cited art, individually or in combination, fails to teach or suggest such aspects of the claimed invention.

Sadahiyo relates to generating source code files for an application program in a computer system. A user first produces a code flow description file. A source code file written in a programming language is generated based upon the code flow description file. (See Abstract). The code flow description file specifies a process or procedure to be performed employing a data acquisition device. For example, the code flow description files describe which inputs to poll and the processing that is performed with input data. A code generator creates a source code file in a target programming language (e.g., C++, Basic, Java, etc.) that can be compiled and/or executed to carry out the tasks expressed in the code flow description file. (See Summary). Thus, Sadahiyo discloses mechanisms to convert a program written in pseudo-code format to a program described in a programming language operable on a computer system and does not disclose retrieval of technical information.

In contrast, applicant's claimed subject matter discloses a system that facilitates finding documentation. The system includes a weighted mapping system that enables tracking and mapping of attempts, both successful and unsuccessful, to discover and interpret technology-specific and programming-language-specific functionality using natural and/or professional language. By tracking and mapping developer terminology and navigation, a database of search attempts can be created which is a significant indicator of technical value for selected technical

information within a documentation set or other data structure residing in the database. This can be achieved by instrumenting (or monitoring) *via* measurement instruments visible technical documentation, associated search engine activity, and/or and network traffic activity, and then analyzing the results of the instrumentation. Such automated measurements can include counters that measure network and documentation access or frequency. Other measurements can include the type of words employed in a respective search to enable a vocabulary of common terms to be constructed. Other measurements can be implied or inferred (*e.g.*, *via* learning process) from the type of activity encountered. For example, the amount of time that a cursor hovers over a particular item or extrinsic evidence of confusion or curiosity (*e.g.*, if a developer copies a data item from a site, may indicate particular value of information as opposed to merely reading data from data site). Still yet other types of measurements may include explicit requests from users regarding a data source's technical value, ranking or merit. (*See* pg. 10, line 22 – pg. 11, line 28).

Sadahiho merely discloses creating source code program files which provide sufficient and consistent documentation elements in the example source code itself regarding what the example does, what functions it uses, its key parameters, and what signal connections to the DAQ device are necessary. (*See* col. 3, lines 12-18). Sadahiho does not disclose a weighted mapping system that enables tracking and mapping of attempts, both successful and unsuccessful, to discover and interpret technology-specific and programming-language-specific functionality using natural and/or professional language. Accordingly, Sadahiho is silent with regard to a system that facilitates finding documentation, comprising: *...a discovery component that retrieves technical articles based upon the terminology of the second vocabulary that is semantically equivalent to the terminology of the first vocabulary employed in the request, wherein the discovery component comprises an instrumentation component to determine an importance value for a retrieved technical document, the instrumentation component monitors at least one of visible technical documentation, search engine activity, and network traffic activity, and further monitors at least one of a counter, a type of word or phrase employed in a search, an implied or inferred measurement of data activity and an explicit request from users regarding a data source's technical value, ranking or merit.*

CiteSeer does not make up for the aforementioned deficiencies of Sadahiho with respect to independent claims 1, 23, 24, 32 and 33 (which claims 2-4, 6-7, 9-12, 20, 22, 26 and 28-29 respectively depend there from). CiteSeer relates to an automatic citation indexing system which indexes academic literature in electronic format. CiteSeer provides literature retrieval by following

citation links, evaluation and ranking of papers, authors, journal, *etc.* based on the number of citations, and identification of research trends. (*See* Abstract, CiteSeer).

Whereas, applicant's claimed subject matter discloses a system that facilitates finding documentation. The system includes a weighted mapping system that enables tracking and mapping of attempts, both successful and unsuccessful, to discover and interpret technology-specific and programming-language-specific functionality using natural and/or professional language. This can be achieved by instrumenting (or monitoring) *via* measurement instruments visible technical documentation, associated search engine activity, and/or and network traffic activity, and then analyzing the results of the instrumentation. (*See* pg. 10, line 22 – pg. 11, line 28).

CiteSeer is merely an automatic citation indexing system that discloses ranking of papers, authors, journals, *etc.* based on the number of citations. CiteSeer does not disclose a weighted mapping system that monitors visible technical documentation, search engine activity and network traffic activity. Accordingly, CiteSeer is silent with regard to a system that facilitates finding documentation, comprising: ... ***an instrumentation component to determine an importance value for a retrieved technical document, the instrumentation component monitors at least one of visible technical documentation, search engine activity, and network traffic activity, and further monitors at least one of a counter, a type of word or phrase employed in a search, an implied or inferred measurement of data activity and an explicit request from users regarding a data source's technical value, ranking or merit.***

In view of the aforementioned deficiencies of the cited art, it is respectfully submitted that this rejection be withdrawn with respect to independent claims 1, 23, 24, 32 and 33 (and claims 2-4, 6-7, 9-12, 20, 22, 26 and 28-29 which depend respectively there from).

## **II. Rejection of Claims 8, 13-19, 27, 30 and 34 Under 35 U.S.C. §103(a)**

In the Final Office Action dated August 9, 2007, claims 8, 13-19, 27, 30 and 34 stand rejected under 35 U.S.C. §103(a) as being unpatentable over by Sadahiro in view of Hofmann (U.S. 6,687,696). It is respectfully submitted that this rejection should be withdrawn for the following reasons. Sadahiro and Hofmann, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Hofmann does not make up for aforementioned deficiencies of Sadahiro with respect to independent claims 1, 24 and 33 (which

claims 8, 13-19, 27, 30 and 34 depend respectively there from). Thus, the claimed subject matter as recited in claims 8, 13-19, 27, 30 and 34 is not obvious over the combination of Sadahiro and Hofmann. Therefore, it is respectfully submitted that this rejection be withdrawn.

**III. Rejection of Claim 21 Under 35 U.S.C. §103(a)**

In the Final Office Action dated August 9, 2007, claim 21 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Sadahiro in view of Jennings (“Special Edition Using Access 97, Second Edition”, published 9 October 1997, section “Working with Relations, Key Fields, and Indexes”). It is respectfully submitted that this rejection should be withdrawn for the following reasons. Sadahiro and Jennings, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Jennings does not make up for aforementioned deficiencies of Sadahiro with respect to independent claim 1 (which claim 21 depends there from). Thus, the claimed subject matter as recited in claim 21 is not obvious over the combination of Sadahiro and Jennings. Therefore, it is respectfully submitted that this rejection be withdrawn.

**CONCLUSION**

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP491US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number below.

Respectfully submitted,

AMIN, TUROCY & CALVIN, LLP

/Himanshu S. Amin/

Himanshu S. Amin

Reg. No. 40,894

AMIN, TUROCY & CALVIN, LLP  
24<sup>TH</sup> Floor, National City Center  
1900 E. 9<sup>TH</sup> Street  
Cleveland, Ohio 44114  
Telephone (216) 696-8730  
Facsimile (216) 696-8731